

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Alex Spiro (*pro hac vice*)

2 alexspiro@quinnemanuel.com

Jesse A. Bernstein (*pro hac vice*)

3 Jessebernstein@quinnemanuel.com

Jonathan E. Feder (*pro hac vice*)

4 jonathanfeder@quinnemanuel.com

295 5th Avenue, 9<sup>th</sup> Floor

5 New York, NY 10016

Telephone: (212) 849-7000

6 Facsimile: (212) 849-7100

7 Michael T. Lifrak (Bar No. 210846)

michaellifrak@quinnemanuel.com

8 Joseph C. Sarles (Bar No. 254750)

josephsarles@quinnemanuel.com

9 Stephen A. Broome (Bar No. 314605)

stephenbroome@quinnemanuel.com

10 Alex Bergjans (Bar No. 302830)

alexbergjans@quinnemanuel.com

11 865 S. Figueroa Street, 10<sup>th</sup> Floor

Los Angeles, California 90017

12 Telephone: (213) 443-3000

Facsimile: (213) 443-3100

13 Nathan Archibald (*pro hac vice*)

14 nathanarchibald@quinnemanuel.com

2755 E. Cottonwood Parkway, Suite 430

15 Salt Lake City, Utah 84121

Telephone: (801) 515-7300

16 Facsimile: (801) 515-7400

17 *Attorneys for Defendant Elon Musk*

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20  
21 GIUSEPPE PAMPENA, on behalf of  
himself and all others similarly situated,

22  
23 Plaintiff,

24 vs.

25 ELON R. MUSK,

26 Defendant.

CASE NO. 3:22-CV-05937-CRB

**DECLARATION OF STEPHEN BROOME  
IN SUPPORT OF DEFENDANT ELON  
MUSK'S ADMINISTRATIVE MOTION  
TO SEAL PORTION OF JOINT LETTER  
TO COURT**

Judge: Hon. Charles R. Breyer

Magistrate Judge: Hon. Donna M. Ryu

1 I, Stephen Broome, declare as follows:

2 1. I am a member of the bar of the State of California and a partner at Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Elon R. Musk in this action. I have personal  
4 knowledge of the facts set forth herein and if called as a witness, I could and would competently testify  
5 thereto. I make this declaration in support of Defendant Elon Musk's Administrative Motion to Seal  
6 Portion of Joint Letter to Court.

7 2. Defendant moves the Court to consider whether the material listed below, filed  
8 herein, and as referenced the parties' joint letter to the Court:

9 **Material to Be Filed Under Seal Under 79-5(c)**

Document	Description	Designating Party
11 <b>Excerpts from the 12 deposition of Defendant, 13 dated May 7, 2025</b>	Highlighted portions of the transcript discuss Defendant's personal information that is also referenced in Paragraph 3 of the joint letter	Defendant
14 <b>Parties' Joint Letter Brief 15 re: Spiro Motion to Quash</b>	Paragraph 3 of Defendant's portion of the joint letter	Defendant

16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct to the best of my knowledge.

18 Executed on this 12th day of May, 2025, in Los Angeles, California.

21 By /s/ Stephen A. Broome  
22 Stephen A. Broome

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served on all counsel of record electronically or by another manner authorized under FED. R. CIV. P. 5(b) on this the 12th day of May, 2025.

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Emily Couture

Alex Spiro  
Michael T. Lifrak  
Joseph C. Sarles  
Stephen A. Broome  
Jesse A. Bernstein  
Alex Bergjans  
Jonathan E. Feder  
Nathan Archibald  
Stephanie Keleman  
Emily Couture

*Attorneys for Defendant Elon Musk*

**ATTESTATION**

Pursuant to Civil L.R. 5-1, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories herein.

By /s/ Emily Couture

Alex Spiro

Michael T. Lifrak

Joseph C. Sarles

Stephen A. Broome

Jesse A. Bernstein

Alex Bergjans

Jonathan E. Feder

Nathan Archibald

Stephanie Keleman

Emily Couture

*Attorneys for Defendant Elon Musk*